

**THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

KENRIC STEEL, LLC,

Plaintiff,

v.

U.S. DEPARTMENT OF LABOR,  
OCCUPATIONAL SAFETY AND  
HEALTH ADMINISTRATION, *et al.*,

Defendants.

Case No. 1:24-cv-09221-KMW-SAK

**JOINT MOTION**

On September 17, 2024, Plaintiff Kenric Steel, LLC filed a four-count complaint alleging, among other things, that the Occupational Safety and Health Review Commission is unconstitutionally structured. *See* Compl., ECF No. 1. Kenric Steel effected service on September 25, 2024 and, after a 14-day extension under Local Rule 6.1(b), Defendants' response to the complaint is now due on December 9, 2024. *See* Clerk's Text Order (Nov. 22, 2024).

The parties have conferred about this case and ask that the Court extend Defendants' December 9, 2024 deadline while they further discuss how best to proceed in this case. Given these further discussions, the parties respectfully request that the parties either submit a joint status report to the Court or Defendants respond to the complaint by February 21, 2025. A proposed order is attached.

DATED: December 4, 2024

/s/ Brandon J. Brigham

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Respectfully submitted,

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